

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

PLAINTIFF'S SUPPLEMENTAL CLAIM CONSTRUCTION STATEMENT

Paul J. Hayes (BBO #227000)
Matthew D. Vella (BBO #660171)
Kevin Gannon (BBO #640931)
Daniel McGonagle (BBO #690084)
Brian M. Seeve (BBO #670455)
PRINCE LOBEL TYE LLP
One International Place, Suite 3700
Boston, MA 02110
Tel: (617) 456-8000
Fax: (617) 456-8100
Email: phayes@princelobel.com
Email: mvella@princelobel.com
Email: kgannon@princelobel.com
Email: dmcgonagle@princelobel.com
Email: bseeve@princelobel.com

ATTORNEYS FOR THE PLAINTIFF

Plaintiff, Singular Computing LLC (“Singular”), respectfully submits this supplemental claim construction statement.

At the February 23, 2021 Status Conference, counsel for defendant, Google LLC (“Google”), requested leave to file a supplemental claim construction brief once Google takes the deposition of Singular’s technical expert herein, Dr. Khatri and to address positions taken by Singular in the ongoing *Inter Partes* Review (“IPR”) proceedings. Counsel for Google did not identify any alleged inconsistencies between Singular’s position here and in the IPR proceedings. Neither is counsel for Singular aware of any such inconsistencies. Pursuant to Google’s request, the Court ordered that the parties may file an “8 page supplemental brief re expert depositions due by 3/15/2021.” *See* Dkt. No. 139.

Google took the deposition of Singular’s expert, Dr. Khatri, on March 12, 2021. The deposition did not reveal any alleged inconsistencies. Accordingly, Singular is left to simply speculate as to what Google is up to. Unaware of any alleged inconsistencies, Singular is currently unable to prepare a supplemental claim construction brief addressing same.

To the extent Google, in its third brief, seeks to raise purported inconsistencies or new claim construction arguments, Singular will move for leave to respond accordingly.

Dated: March 15, 2021

Respectfully submitted,

/s/ Paul J. Hayes

Paul J. Hayes (BBO #227000)

Matthew D. Vella (BBO #660171)

Kevin Gannon (BBO #640931)

Daniel McGonagle (BBO #690084)

Brian M. Seeve (BBO #670455)

PRINCE LOBEL TYE LLP

One International Place, Suite 3700

Boston, MA 02110

Tel: (617) 456-8000

Fax: (617) 456-8100

Email: phayes@princelobel.com

Email: mvella@princelobel.com

Email: kgannon@princelobel.com

Email: dmcgonagle@princelobel.com

Email: bseeve@princelobel.com

ATTORNEYS FOR THE PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

/s/ Paul J. Hayes